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SEP 16 2021

AT SEATTLE  
 CLERK U.S. DISTRICT COURT  
 WESTERN DISTRICT OF WASHINGTON  
 BY DEPUTY

United States District Court  
 Western District of Washington

United States of America  
 Plaintiff

CR-09-269-MJP  
 CR-13-310-RSL

✓  
 Muhammad Tillisy  
 Defendant

MOTION TO APPOINT  
 Counsel

Defendant files a request with the  
 court for Appointment of Counsel for  
 the following Reasons:

1. Defendant is legally blind and suffer from  
 A Brain Condition - PseudoTumor Cerebri  
 and had A Crainectomy done on his skull
2. Defendant was denied previously Appointment  
 to persue A "compassionate Release" 18 USC  
 3582(C)(1)(A) because he is not yet in  
 Federal Custody.
3. Defendant would request Appointed Counsel to  
 petition court to suspend the execution of  
 his sentence in which he MR Tillisy has not  
 Formally begun with the "Bureau of Prisons"

Mr. Tillisy has yet to be delivered by the U.S. Marshals into Bureau of Prisons custody. In light of the severity of Mr. Tillisy's situation the Court has in its inherent authority to suspend the execution of Mr. Tillisy's sentence so he may seek release via Extraordinary Medical Placement for the remainder of his state sentence. Bw, WAC and DOC Policy don't allow for such a release with a Federal Marshal Detainee


4. Courts have historically allow defendants months now with even Covid years to begin serving their Prison Sentence. 18 USC 3141 also allows for such release prior to beginning the sentence.

The court in the alternative can just suspend the execution of sentences for 13-310-RSL 8 yrs and 09-269-MJP (Supervised Release Violation).

5. With the suspension the U.S. Marshals would notify the Dept of Corrections and Mr. Tillisy can then request for Release under the Extraordinary Medical Placement.

6. The Court previously stated since Mr Tillis was not in federal custody he could not petition for removal of detainee placed by the U.S. Marshal.  
Also court refused appointment after the Federal Public Defender Michael Filiopovic stated that 18 U.S.C 3582 WAS not a viable option
7. Appointing Counsel could also allow them to contact the Government who may not object to the request of suspending the sentences for a determine period. For relief we request Appointment of Counsel and/or suspension of sentences.

9-8-21

Respectfully Submitted  


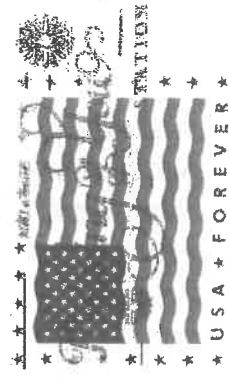
Muhammed Tiliy #870270  
Twin Rivers Unit - MCC  
P.O. Box 888; B-315  
monroe, WA 98272

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AT SEATTLE  
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WESTERN DISTRICT OF WASHINGTON  
BY

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United States District Court  
Western District of Washington  
700 Stewart Street  
Seattle WA 98101

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